

Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

JAN - 9 2006

Dr. Gregory Langley President / Owner Langley Animal Clinic Route 1, Box 1279-A, Missouri Highway 142 Thayer, MO 65791

RE: New Source Review Permit, Permit by Rule

Project Number: 2005-04-076, Facility ID Number: 149-0023

Dear Dr. Langley:

On April 21, 2005, you submitted a "Permit by Rule" application for a animal crematory. The original intention of the Permit by Rule was to allow a source to construct and operate the applicable source as soon as you submitted the application to our office. The Permit by Rule language states that the permit shall be approved after an initial on-site compliance inspection. However, in order to streamline the permitting process and satisfy requirements of the Environmental Protection Agency, the department has modified the procedures on these types of permits. The department now intends to review and approve permit by rule applications within seven days of submittal. The department will verify the permit during an on-site compliance inspection at a later date.

However, this does not affect your application or permit. Your Permit by Rule notification is valid as of the submittal day, April 21, 2005. Enclosed with this letter are a permit certificate and a copy of your application. The reverse side of the permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri. The application contains the special conditions applicable to your source. Operation in accordance with these conditions is necessary for continued compliance. Please keep the permit form and application in your files.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to me at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kyra L. Moore

Permits Section Chief

KLM: jbl

Enclosures

c:

Southeast Regional Office PAMS File: 2005-04-076

Permit Number: 01 2 0 0 6 - 0 0 4

Recycled Paper

PERMIT TO **CONSTRUCT** PERMIT BY RULE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct and operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Construction Permit Number: 01 2 0 0 6 - 0 0 4

Project Number: 2005-04-076 Installation ID: 149-0023

Installation Name and Address

Langley Animal Clinic Route 1, Box 1279-A, Missouri Highway 142 Thayer, MO 65791 **Oregon County**

Parent Company's Name and Address

Installation Description: Animal crematory, fired off propane gas.	

JAN	-	9	200)6
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Effective Date

Director or Designee

Department of Natural Resources

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 and 10 CSR 10-6.062 if you fail to adhere to the specifications and conditions listed in your permit by rule application and this permit. Specifically, all air contaminant control devises shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Department of Natural Resources Regional office responsible for the area within which the equipment is located within 15 days after the actual start up of this air contaminant source or as soon as you receive your permit.

A copy of this permit and permit notification shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, Missouri 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review, your application and associated correspondence constitutes your permit to construct. The permit allows you to construct <u>and</u> operate your air contaminant sources(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102-0176, attention: Construction Permit Unit.



RECEIVED

2005 APR 21 MIII: 50

April 6, 2005

Air Pollution Control Program Permit-By-Rule PO Box 176 Jefferson City, MO 65102

Re: Application For Authority To Construct Permit By Rule Notification Langley Animal Clinic (CB200) Route 1, Box 1279-A Thayer, Oregon County, MO 65791

To Whom It May Concern:

Pursuant to 10CSR 10-6.062(3)(b)2 the above referenced facility is capable of meeting the requirements of the Crematories and Animal Incinerators Permit By Rule Requirements. Enclosed, find a signed and dated Application For Authority To Construct Permit By Rule Notification, as well as an application fee check in the amount of \$700.00.

The facility will be installing a dual chamber Crawford Industrial Group Model CB200 animal crematory.

Should you have any questions or need any additional information for issuing the proper permit, please contact me at (407) 822-7655.

Respectfully submitted,

General Environmental Engineering, Inc.

Douglas W. Bauman, MSE, P.E. Vice President/Senior Engineer

Attachment: Crematories and Animal Incinerators Permit By Rule Requirements Notification Package

cc: Dr. Greg Langley

Brian Gamage, CIG (w/out attachments)

File



MISSOURI DEPARTMENT OF NATURAL RESOURCES AIR POLLUTION CONTROL PROGRAM 1005 102 21

P.O. BOX 176, JEFFERSON CITY, MO 65102-0176

APPLICATION FOR AUTHORITY TO CONSTRUCT PERMIT BY RULE NOTIFICATION

700.00 PROJECT NO

APCP USE ONLY

CREMATORIES AND ANIMAL INCINERATORS SECTION A: GENERAL NOTIFICATION INFORMATION - ALL NOTIFICATIONS MUST BE ACCOMPANIED BY A \$700 FEE **SECTION A-1: GENERAL INSTALLATION INFORMATION** 3. PLANT NO. 149 Langley Animal Clinic STATE ZIP CODE MO 65 791 NW 1/4, of NE 33 SECTION **TOWNSHIP** 22 RANGE 10. PARENT COMPANY MAILING ADDRESS NA ZIP CODE NA NA NA 13. CONTACT PERSON'S TITLE 15. INSTALLATION CONTAC 16. INSTALLATION CONTACT FAX NO (417) 264 - 2206 langley vet & tek-web. Com DIECTED DATE TO COMMENCE CONSTRUCTION 19. PROJECT DATE OF OPERATION STARTUP May 25, 2005 May 15, 2005 SECTION A-2: INSTALLATION DESCRIPTION Crawford model CB200 Animal Crematory, fired off propane **SECTION A-3: CERTIFICATION STATEMENT** I certify that I have personally examined and am familiar with the information in this application and believe that the information submitted is accurate and complete. I am aware that making a false statement or misrepresentation in this application is grounds for denying or revoking this permit. 21. SIGNATURE OF RESPONSIBLE OFFICIAL 22. DATE 24. RESPONSIBLE OFFICIAL'S TELEPHONE NUMBER (417) 264-2206 MO 780-1888 (3-04) PAGE 1

SECTION B: SPECIAL CONDITIONS FOR CREMATORIES AND ANIMAL INCINERATORS

Construction and operation of this new air pollution source is subject to the special conditions listed below. These special conditions are based on the authority granted to the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically RSMo. 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.062 "Construction Permits by Rule").

Please indicate by marking the appropriate box as to whether or not the emission source complies with the rule listed in the applicable emission limit or standard. If any of the applicable emission source boxes are checked no, your source is not eligible for a crematories and animal incinerators permit by rule.

This Permit By Rule applies only to Crematories and Animal Incinerators constructed after October 31, 2003.

SPECIAL CONDITION	EMISSION SOURCE COMPLY?	APPLICABLE EMISSION LIMIT OR STANDARD	METHOD OF COMPLIANCE
10 CSR 10-6.062(3)(B)2.A.	☑YES □ NO	The materials to be disposed of shall be limited to noninfectious human materials removed during surgery, labor and delivery, autopsy, or biopsy including body parts, tissues and fetuses, organs, bulk blood and body fluids, blood or tissue laboratory specimens, and other noninfectious anatomical remains or animal carcasses in whole or in part. The owner or operator shall minimize the amount of packaging fed to the incinerator, particularly plastic containing chlorine. The incinerators shall not be used to dispose of other non-biological medical wastes including, but not limited to, sharps, rubber gloves, intravenous bags, tubing, and metal parts.	Proper work practice.
10 CSR 10-6.062(3)(B)2.B.	V YES □ NO	The manufacturer's rated capacity (burn rate) shall be two hundred (200) pounds per hour or less.	Proper work practice.
10 CSR 10-6.062(3)(B)2.C.	YES NO	The incinerator shall be a dual-chamber design.	Proper work practice.
10 CSR 10-6.062(3)(B)2.D.	M YES □ NO	Burners shall be located in each chamber, sized to manufacturer's specifications, and operated as necessary to maintain the minimum temperature requirements of subparagraph 10 CSR 10-6.062(3)(B)2.E. at all times when the unit is burning waste.	Proper work practice.
10 CSR 10-6.062(3)(B)2.E.	YES □ NO	Excluding crematories, the second chamber must be designed to maintain a temperature of one thousand six hundred degrees Fahrenheit (1,600°F) or more with a gas residence time of one-half (1/2) second or more. The temperature shall be monitored with equipment that is accurate to plus or minus two percent (±2%) and continuously recorded. The thermocouples or radiation pyrometers shall be fitted to the incinerator and wired into a manual reset noise alarm such that if the temperature of either of the two (2) chambers falls below the minimum temperature above, the alarm will sound at which time plant personnel shall take immediate measures to either correct the problem or cease operation of the incinerator until the problem is corrected	Proper work practice and maintenance of proper alarm records. These records shall be maintained for not less than five (5) years, and they shall be immediately available to any Missouri Department of Natural Resources personnel upon request.
10 CSR 10-6.062(3)(B)2.F.	™YES	There shall be no obstruction to stack flow, such as by rain caps, unless such devices are designed to automatically open when the incinerator is operated. Properly installed and maintained spark arresters are not considered obstructions.	Proper work practice.

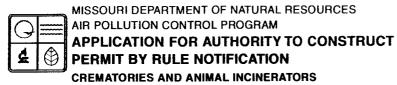
SECTION B: SPECIAL CON	DITIONS FOR	CREMATORIES AND ANIMAL INCINERATOR	S (CONTINUED)
SPECIAL CONDITION	EMISSION SOURCE COMPLY?	APPLICABLE EMISSION LIMIT OR STANDARD	METHOD OF COMPLIANCE
10 CSR 10-6.062(3)(B)2.G.	MYES □ NO	Each incinerator operator shall be trained in the incinerator operating procedures as developed by the American Society of Mechanical Engineers (ASME), by the incinerator manufacturer, or by a trained individual with more than one (1) year experience in the operation of the incinerator that the trainee will be operating. Minimum training shall include basic combustion control parameters of the incinerator and all emergency procedures to be followed should the incinerator malfunction or exceed operating parameters. An operator who meets the training requirements of this condition shall be on duty and immediately accessible during all periods of operation. The manufacturer's operating instructions and guidelines shall be posted at the unit and the unit shall be operated in accordance with these instructions.	Proper work practice and maintenance of proper operator training records. These records shall be maintained for not less than five (5) years, and they shall be immediately available to any Missouri Department of Natural Resources personnel upon request.
10 CSR 10-6.062(3)(B)2.H.	M YES □ NO	The incinerator shall have an opacity of less than ten percent (10%) at all times.	Proper work practice such that no opacity violations are noted.
10 CSR 10-6.062(3)(B)2.I.	₩YES □ NO	Heat shall be provided by the combustion of natural gas, liquid petroleum gas, or Number 2 fuel oil with less than three-tenths percent (0.3%) sulfur by weight, or by electric power.	Proper work practice.
10 CSR 10-6.062(3)(B)2.J.	IVYES □ NO	The operator shall maintain a log of all alarm trips and the resulting action taken. A written certification of the appropriate training received by the operator, with the date of training, that includes a list of the instructor's qualifications or ASME certification school shall be maintained for each operator. The operator shall maintain an accurate record of the monthly amount and type of waste combusted.	Determined through proper alarm and operator training record keeping. These records shall be maintained for not less than five (5) years, and they shall be immediately available to any Missouri Department of Natural Resources personnel upon request.

SECTION C: OTHER POTENTIALLY APPLICABLE REQUIREMENTS

This section is intended to identify regulations that may apply to this installation. There may be others not listed that apply. To determine rule applicability and specific standards please consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

Please note: this permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources, and other applicable federal, state, and local laws and ordinances.

REGULATION OR CONSTRUCTION PERMIT REFERENCE	APPLICABLE EMISSION LIMIT OR STANDARD	METHOD OF COMPLIANCE
10 CSR 10-2.100, 10-3.030, or 10-4.090, 10-5.070 Open Burning Restrictions	Shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.	Any person intending to engage in open burning shall submit a request to the Director.
10 CSR 10-2.070, 10-3.090 or 10-4.070, Restriction of Emission of Odors	No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when air is diluted to 1:7 volumes of odorous to odor-free air for 2 separate trails not less than 15 minutes apart within 1 hour.	No odor violations noted, if and when scentometer readings are taken.
10 CSR 10-5.160 Control of Odors in the Ambient Air	No person shall emit odorous matter as to cause an objectionable odors unless within the limits established by this rule.	No odor violations noted, if an when scentometer readings are taken.
10 CSR 10-5.170 Control of Odors From Processing Animal Matter	No person shall operate or use any device, machine, equipment, or other contrivance for the reduction of animal matter unless all gases, vapors, and gas-entrained effluents from the facility are incinerated at a temperature of not less than 1,200°F for a period of not less than 0.3 seconds and otherwise in compliance with this rule.	Proper work practice.
10 CSR 10-6.050, Start-up, Shutdown and Malfunction Conditions	Shall not commence construction or modification of any installation subject to this rule; begin operation after construction or modification; or begin operation of any installation which has been shut down longer than 5 years without first obtaining a permit.	In the event of a malfunction, which results in excess emissions that exceed 1 hour, the permittee shall implement corrective action and submit reports.
10 CSR 10-6.065, Operating Permits	The permittee shall comply with all applicable requirements identified in the operating permit (OP); file for timely renewal of this OP; and retain a copy of the OP on-site and make available to any MDNR personnel upon request.	The permittee shall submit an annual compliance certification in accordance with the regulation. The permittee shall maintain a current equipment list on-site with the date of installation of the equipment.
10 CSR 10-6.110, Submission of Emission Data, Emission Fees and Process Information	Submittal of Emission Inventory Questionnaire (EIQ) and emission fees by frequency noted in 10 CSR 10-6.110.	The permittee shall complete and submit an EIQ in accordance with 10 CSR 10-6.110.
10 CSR 10-6.200 Hospital, Medical, Infectious Waste Incinerators	No owner or operator shall cause to be discharged into the atmosphere any gases that contain stack emissions in excess of those listed in 10 CSR 10-6.200(3)(A).	Proper work practice and maintenance of appropriate performance test results.
10 CSR 10-6.070 New Source Performance Regulations	The following federal NSPS standards may apply: (Ec) Medical Waste Incinerators. Standards of Performance for Incinerators.	As required by regulations.



INSTRUCTIONS

By submitting your notification, you are accepting all conditions and terms stated in this form. If you find the special conditions listed in Section B unacceptable, you may choose to submit a construction permit application and undergo a case-by-case review.

Please refer to the following line-by-line instructions to complete the notification. The notification, along with the \$700.00 fee, should be mailed to:

Air Pollution Control Program Permit-By-Rule P.O. Box 176 Jefferson City, Missouri 65102

You must also retain a copy of the notification at the installation and make it immediately available to any inspector.

Once the fee and notifications have been mailed or hand-delivered, you are free to begin construction of your project under the special conditions that you have accepted.

The Air Pollution Control Program will send you a letter acknowledging receipt of your notification with a permit number and a project number for agency tracking purposes.

A copy of this electronic package may be obtained from the Department of Natural Resources Air and Land Protection Division's web site at: http://www.dnr.mo.gov/alpd/apcp/PermitInfo.htm.

If you have any questions about the notification form or the permit-by-rule notification procedure, please feel free to contact the Permit Section at (573) 751-4817.

NOTIFICATION FORM INSTRUCTIONS

- Installation Name: Enter the official company name and/or plant designation for the installation that is making the permit-by-rule notification.
- 2.) **FIPS Number:** Enter the official FIPS Number (3 digit code) which corresponds to the county name for the county in which the installation is located. Please refer to http://www.itl.nist.gov/fipspubs/co-codes/mo.txt for a listing. The FIPS number in combination with the Plant Number provides the identification/tracking information for the installation in the State/Federal databases.
- 3.) Plant Number: Enter the official Plant Number that has been assigned to the installation by the respective State or Local Agencies. If you do not know your plant number, please leave blank.
- 4.) Installation Street Address: Enter the street address of the physical location of installation.
- 5.) Installation Mailing Address: Enter the mailing address if that address is different from the street address.
- 6.) City, State and Zip Code: Enter the City, State and Zip Code of the physical location of the installation.
- 7.) County: Enter the county in which the installation is located.
- 8.) Section, Township, Range: Enter the appropriate information on the Section, Township and Range in which the installation is located.
- 9.) Parent Company: Complete this block if this installation is totally or partially owned by another company.
- 10.) Parent Company Mailing Address: Complete this block if this installation is totally or partially owned by another company.
- 11.) Parent Company City, STate and Zip Code: Complete this block if this installation is totally or partially owned by another company.
- 12.) **Installation Contact Person:** Enter the name of the person who is most familiar with the operations of the installation and who can answer any questions regarding information about the installation.
- 13.) Contact Person's Title: Enter the title of the contact person.
- 14.) Contact Person's Mailing Address: Enter the mailing address for the Contact Person.
- 15.) Installation Contact Person's Telephone Number: Enter the Contact Person's telephone number.
- 16.) Installation Contact Person's Fax Number: Enter the Contact Person's fax number.

NOTIFICATION FORM INSTRUCTIONS (CONTINUED)

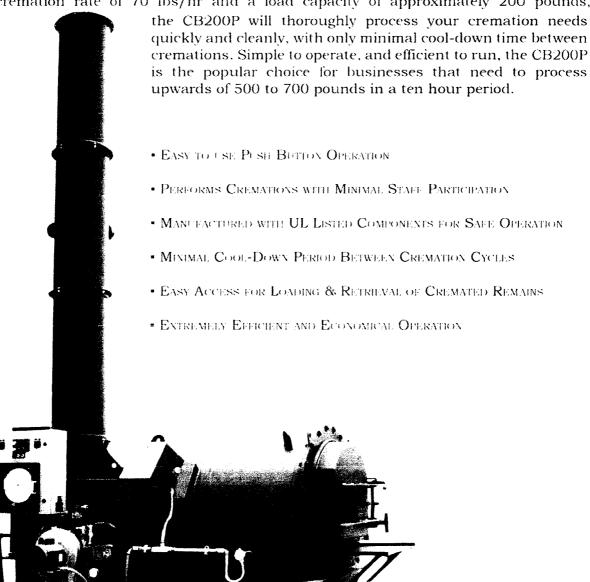
- 17.) Installation Contact Person's E-Mail Address: Enter the Contact Person's e-mail address.
- 18.) Projected Date to Commence Construction: Enter the date you intend to commence construction of your installation.
- 19.) Projected Date of Operation Startup: Enter the date you plan to begin operation with the installation.
- 20.) **Installation Description:** Enter the general product manufactured, the material handled by your installation and principal activity that is performed at this installation.
- 21.) **Signature of Responsible Official:** Enter the signature of the installation's official, certifying that the notification is accurate and complete. Notifications without a signed certification are not considered complete. A responsible official is:
 - 1. The president, secretary, treasurer or vice-president of a corporation in charge of a principal business function, or any other person who performs similar policy and decision-making functions for the corporation or a duly authorization representative of this person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either
 - a) The facilities employ more than 250 person or have a gross annual sales or expenditures exceeding twenty-five million dollars (in second quarter 1980 dollars); or
 - b) The delegation of authority to his representative is approved in advance by the permitting authority.
 - 2. A general partner in a partnership or the proprietor in a sole proprietorship.
 - 3. Either a principal executive officer or a ranking elected official in a municipality, state, federal, or other public agency. For the purpose of this part, a principal executive officer of a federal agency includes the chief executive officer having responsibility for the operations of a principal geographic unit of the agency; or
 - 4. The designated representative of an affected source insofar as actions, standards, requirements or prohibitions under Title IV of the Clean Air Act or the regulations promulgated under the Act are concerned or the designated representative for any purposes under Part 70.
- 22.) Date: Enter the date that the Signature of the Responsible Official was obtained.
- 23.) Type or Print Name of Responsible Official: Type or print the name of the Responsible Official signing in item 21.
- 24.) Responsible Official's Telephone Number: Enter the telephone number where the Responsible Official may be contacted who signed in item 21.
- 25.) Title of Responsible Official: Enter the official title of the Responsible Official from item 21.

MO 780-1888 (3-04)

CRAWFORD MODEL CB200P BATCH CREMATORY

NATURAL GAS, LPG, OR DIESEL

The Crawford Model CB200P is a multi-chambered, batch load crematory, designed to comply with today's most stringent environmental and safety standards. The CB200P is an ideal system in which to process individual or communal cremations. With a cremation rate of 70 lbs/hr and a load capacity of approximately 200 pounds,





9101 Parkers Landing Orlando, Florida 32824-8093 voice: 407.851.0993 facsimile: 407.851.2406

sales and service: 1.800.228.0884

www.animal-cremation.com www.crawfordequipment.com

CRAWFORD MODEL CB200P BATCH CREMATORY

CRAWFORD

CRAWFORD MODEL CB200P SPECIFICATIONS

Model: CB200P (gas fired - std. / oil fire option - available)

Hot hearth, multiple chamber, controlled air, batch cycle Type:

@ 5,500 Btu/lb. waste - 70 lb./hr. Capacity ratings:

10 cu. ft. (200 lbs. @ 25 lb./cu. ft. density) Batch load capacity:

10'-4" L x 6'-9" W x 5'-8" H (w/o stack) Overall dimensions:

With std. 12' stack = 17'-8"' el. from grade

Approx. system weight: 11,000 lbs.

1.15 MMBtu/hr Pressure: 9" W.C. Required fuel: NG/LPG

> 9 Gallons/Hour, Tank to be within 10' Diesel Oil

Required electrical supply: 115 V, 1Ø, 60 Hz (50 Hz & alt. voltage available)

20 amp @ single point connection

Primary chamber volume: 26 cu. ft.

7 sq. ft. Hearth Area:

Secondary chamber volume: 34 cu. ft.

400,000 Btu/hr. (modulated control) Primary burner capacity:

Secondary burner capacity: 750,000 Btu/hr. (modulated control)

Charging/cleanout door: 36"W x 26"H. opening (manual hinged type)

99 scfm (std.- ³/₄ hp 120V, 10, 60 Hz) Combustion air supply:

Construction: .250" A36 CS plate shells

.250" x 3" FB reinforcement 4" 3000°F cast refractory lining

1" 1900°F insulation

2600°, 8# fiber w/silica free, zirconia coating in door

Stack: 18"od x 12"id x 48"L sections (qty. 2 std.)

> 10 ga. A36 CS shell 3" 2400°F LWI castable approx. weight - 125 lb./ft.



9101 Parkers Landing Orlando, Florida 32824-8093 voice: 407.851.0993 facsimile: 407.851.2406

sales and service: 1.800.228.0884

www.animal-cremation.com www.crawfordequipment.com



Predicted Operational Cost Analysis **Model CB200**

Operating Fuel Costs

Fuel Use Assumptions

a. Hours of operation:
b. Incinerator outlet temperature:
3 Hour Cycle
1800°F

c. Average waste stream fuel content:
d. Average auxiliary fuel usage:
e. Cost per therm or gallon of fuel:
f. Cremation rate
1,000 BTU per Pound
450,000 BTU per Hour
.50 per Therm or Gallon
70 Pounds per Hour

Fuel Use Calculations

450,000 BTU / HR = 450 Cubic Feet per Hour Fuel Usage

1000 BTU / FT³

450 CF / HR = 4.5 Thm per Hour Fuel Usage

100 CF / Thm

4.5Thm x \$.50 / Thm = \$2.25 per Hour of Operation

Operating Electrical Cost

Electricity Use Assumptions

a. Hours of operation: 3 Hour cycle

b. Maximum horsepower consumption: 1 HP c. Electrical service factor: .75

d. Electricity cost .06 / KW

Electricity Use Calculations

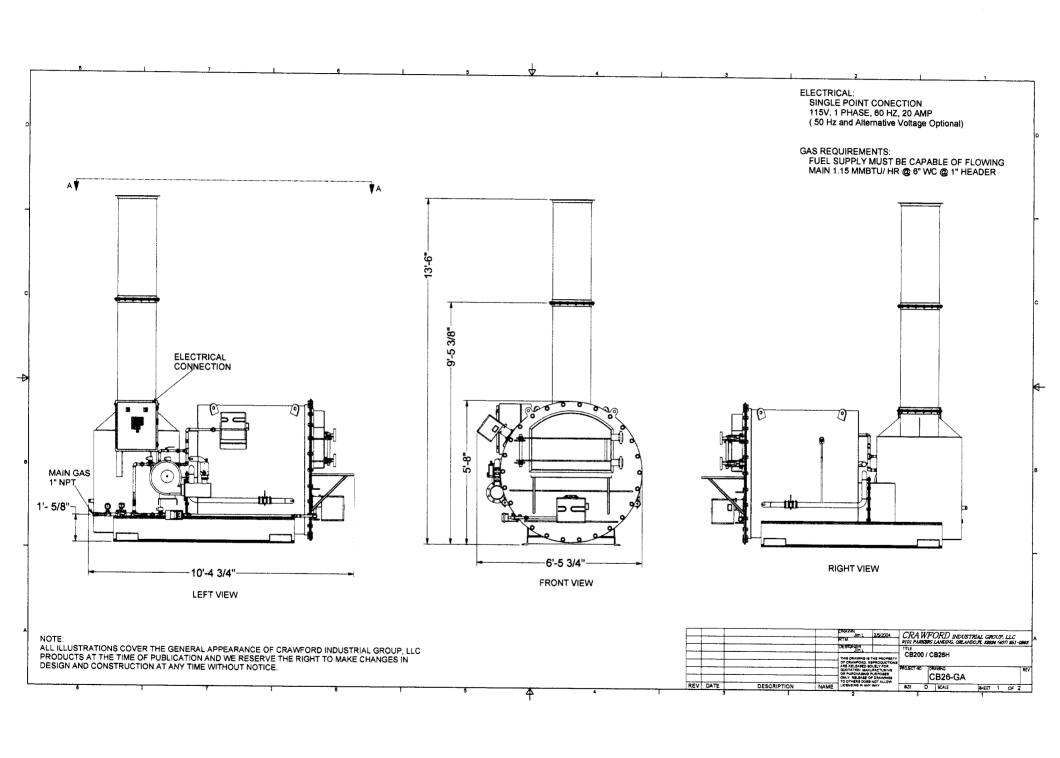
 $\underline{1 \text{ HP x .75}} = \underline{.75 \text{ KW / Hr usage}}$

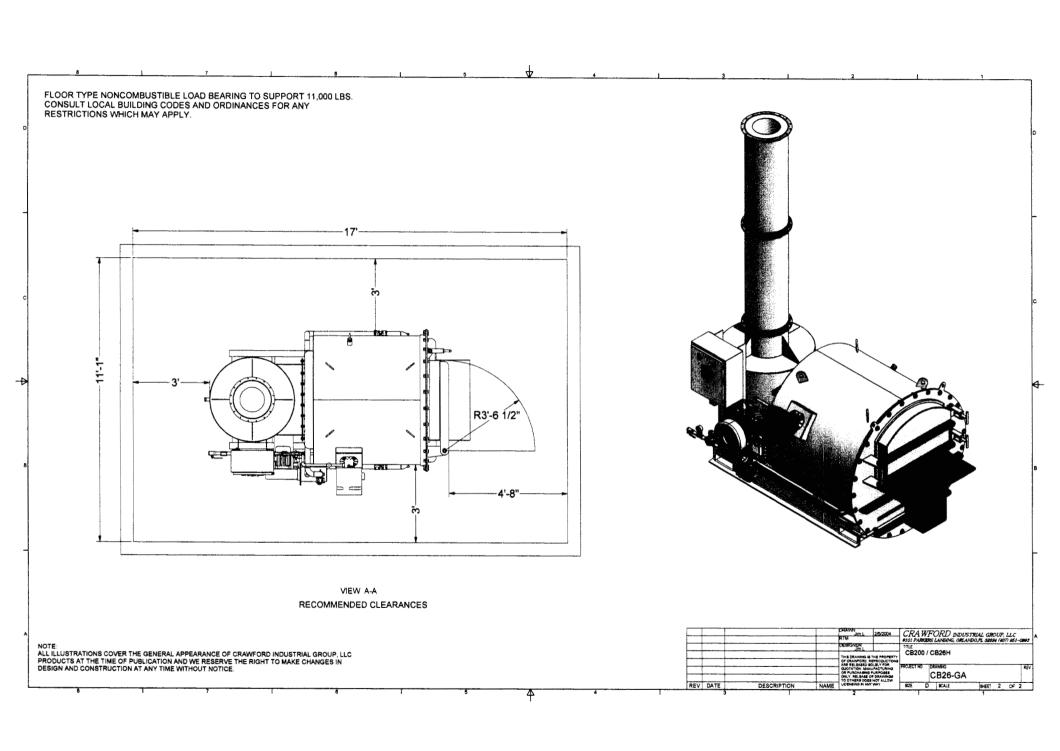
 $\frac{.75 \text{ KW} / \text{Hr x } .06 / \text{KW}}{} = \frac{\$0.045 / \text{Hr of operation}}{}$

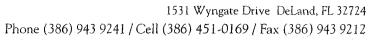
Total Net Operating Costs

\$2.30 per Hour of Operation

\$0.03 per Pound Cremated









COMPLETE EMISSIONS TESTING SERVICES • PERMITTING ASSISTANCE • CEMS CERTIFICATION • AMBIENT AIR MONITORING

Emissions Test Report

CRAWFORD INDUSTRIAL GROUP

PATHOLOGICAL INCINERATION UNIT CB26H/CB200P

PARTICULATE EMISSIONS

Prepared for:

Crawford Industrial Group 9101 Parkers Landing Orlando, FL 32824-8093

Prepared by:

Coastal Air Consulting, Inc. 1531 Wyngate Dr. DeLand, FL 32724 (386) 943-9241

August 20, 2003

STATEMENT OF VALIDITY

All testing activities and results represented herein were conducted and obtained in accordance with the approved EPA protocols listed in 40 CFR Part 60. The contents have been reviewed and verified to be true and correct.

Stephen C. Webb

Steplen C. Will President

Coastal Air Consulting, Inc.

1531 Wyngate Dr.

DeLand, FL 32724

(386) 943-9241

PROJECT STATISTICS

Client:

Crawford Industrial Group

Facility:

Crawford Industrial Group Fabrication Plant Pathological Incineration Unit CB26H/CB200P

Location:

9101 Parkers Landing Orlando, FL 32824-8093

Type of Process Tested:

Animal Crematory

Test Protocols Performed:

Particulate-EPA Method 5
Opacity-EPA Method 9

Carbon Monoxide- EPA Method 10

Testing Firm:

Coastal Air Consulting, Inc.

1531 Wyngate Dr. DeLand, FL 32724

Test Personnel:

Steve Webb

Site Supervisor

Taylor Smith

Technician

Colin Smith

Technician

Test Date:

July 17 & 18, 2003

Client Representative:

Mike Nadelkov

Observers:

None

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LETTER OF TRANSMITTAL

TITLE PAGE

STATEMENT OF VALIDITY

PROJECT STATISTICS

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- 3 Results of Testing
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- 6 Operating Conditions
- 7 Quality Assurance

APPENDICES

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- 3 Figures
- 4 Quality Assurance
- 5 Sample Calculations
- 6 Residence Time Calculations

Coastal Air Consulting, Inc. (Coastal) was contracted by Crawford Industrial Group to perform the initial compliance testing for particulate emissions, visible emissions and carbon monoxide on the Crawford Industrial Group CB26H/CB200P Pathological Incineration Unit.

The sampling program was conducted July 17 & 18, 2003. The testing was performed by Coastal personnel, with the assistance of personnel assigned by Crawford Industrial Group. Mr. Mike Nadelkov coordinated plant operation during the testing.

2.0 Test Program Summary

A summary of test results developed by this source sampling program is presented in TABLES 1,2 and 3 as follows;

TABLE 1
Summary of Particulate Emissions

Source	Particulate Grains/dscf @ 7% O2	Allowable Grains/dscf @ 7% O2
CB26H/CB200P @ 1600 °F	0.007	0.08
CB26H/CB200P @ 1800 °F	0.008	0.08

TABLE 2
Summary of Visible Emissions

Source	Average VE %	Highest 6 min. Avg.	Allowable %
CB26H/CB200P @ 1600 °F	0.0	0.0	5
CB26H/CB200P @ 1800 °F	0.0	0.0	5

TABLE 3
Summary of CO Emissions

Source	CO ppm @ 7% O2	Permit ppm @ 7 % O2
CB26H/CB200P @ 1600 °F	0.24	100
CB26H/CB200P @ 1800 °F	0.33	100

3.0 Results of Testing

Individual test run results are shown in Tables 4 & 5 and are tabulated in Appendix 1. These results indicate that the Pathological Incineration Unit CB26H/CB200P was in compliance at the time of testing under normal operating conditions.

TABLE 4 COASTAL AIR CONSULTING, INC.

PARTICULATE EMISSION TEST SUMMARY

CLIENT: CRAWFORD INDUSTRIAL GROUP

UNIT: CB26H/CB200P

TEST: 1600°F METHOD: 5

	RUN 1	RUN 2	RUN 3
DATE OF RUN	7/17/03	7/17/03	7/17/03
START TIME (24-HR CLOCK)	1335	1500	1614
END TIME (24-HR CLOCK)	1440	1603	1715
VOL DRY GAS SAMPLED METER COND (DCF)	43.603	45.255	41.238
BAROMETRIC PRESSURE (IN. HG)	29.95	29.95	29.95
AVG ORIFICE PRESSURE DROP (IN. H20)	1.698	1.698	1.365
AVG GAS METER TEMP (F)	114.0	116.1	103.1
GAS METER CALIBRATION FACTOR	1.0260	1.0260	1.0260
VOL GAS SAMPLED STD COND (DSCF)	41.348	42.756	39.828
TOTAL WATER COLLECTED (G)	166.3	119.8	91.7
VOL WATER COLLECTED STD COND (SCF)	7.84	5.65	4.32
MOISTURE IN STACK GAS (% VOL)	15.94	11.67	9.79
MOLE FRACTION DRY GAS	0.841	0.883	0.902
CO2 VOL PERCENT DRY	10.3	11.3	5.1
O2 VOL PERCENT DRY	6.6	6.5	13.1
N2 VOL PERCENT DRY	83.10	82.20	81.80
MOL. WT. DRY STACK GAS (LB/LB-MOLE)	29.91	30.07	29.34
MOL. WT. WET STACK GAS (LB/LB-MOLE)	28.01	28.66	28.23
ELEV. DIFF. FROM MANOM. TO BAROM. (FT)	0.00	0.00	0.00
STACK GAS STATIC PRESSURE (IN. H2O GAGE)	0.01	0.01	0.01
STACK GAS STATIC PRESSURE (IN. HG ABS.)	29.95	29.95	29.95
AVERAGE SQUARE ROOT VELOCITY HEAD	0.348	0.348	0.312
PITOT TUBE COEFFICIENT	0.84	0.84	0.84
AVG STACK TEMP (F)	1530.0	1570.8	1572.3
STACK GAS VELOCITY STACK COND (FT/SEC)	38.48	38.43	34.72
CROSS SECTION STACK AREA (SQ FT)	8.0	8.0	8.0
STACK GAS FLOW RATE STD COND (DSCFM)	412.4	424.0	391.0
STACK GAS FLOW RATE STACK COND (ACFM)	1847.1	1844.5	1666.8
NET TIME OF RUN (MIN)	60	60	60
NOZZLE DIAMETER (IN)	0.499	0.499	0.499
PERCENT ISOKINETIC	98.50	99.05	100.05
PARTICULATE COLLECTED (MG)	36.4	22.3	7.8
RESIDENCE TIME (SEC)	1.10	1.11	1.22
PARTICULATE EMISSIONS (GRAINS/SCF)	0.0136	0.0080	0.0030
PARTICULATE EMISSIONS (GRAINS/SCF) @ 7%02	0.0132	0.0054	0.0020
PARTICULATE (LBS/HR)	0.048	0.029	0.010
· · · · · · · · · · · · · · · · · · ·	0.040		0.010
AVERAGE PARTICULATE EMISSIONS (GRAINS/SCF)		0.0082	
AVERAGE PARTICULATE EMISSIONS (GRAINS/SCF) @ 7%C		0.0069	
NOTE: STANDARD CONDITIONS 68F, 29.92 in.	Hg		

TABLE 5 COASTAL AIR CONSULTING, INC.

PARTICULATE EMISSION TEST SUMMARY

CLIENT: CRAWFORD INDUSTRIAL GROUP

UNIT: CB26H/CB200P

TEST: 1800°F METHOD: 5

	RUN 1	RUN 2	RUN 3
DATE OF RUN	7/18/03	7/18/03	7/18/03
START TIME (24-HR CLOCK)	948	1103	1220
END TIME (24-HR CLOCK)	1050	1205	1323
VOL DRY GAS SAMPLED METER COND (DCF)	36.443	37.272	39.434
BAROMETRIC PRESSURE (IN. HG)	30.02	30.02	30.02
AVG ORIFICE PRESSURE DROP (IN. H20)	1.251	1.203	1.284
AVG GAS METER TEMP (F)	94.3	108.5	115.8
GAS METER CALIBRATION FACTOR	1.0180	1.0180	1.0180
VOL GAS SAMPLED STD COND (DSCF)	35.554	35.448	37.039
TOTAL WATER COLLECTED (G)	157.8	112.6	99.1
VOL WATER COLLECTED STD COND (SCF)	7.44	5.31	4.67
MOISTURE IN STACK GAS (% VOL)	17.31	13.03	11.20
MOLE FRACTION DRY GAS	0.827	0.870	0.888
CO2 VOL PERCENT DRY	10.2	8.8	6.5
O2 VOL PERCENT DRY	6.5	8.3	11.0
N2 VOL PERCENT DRY	83.30	82.90	82.50
MOL. WT. DRY STACK GAS (LB/LB-MOLE)	29.89	29.74	29.48
MOL. WT. WET STACK GAS (LB/LB-MOLE)	27.83	28.21	28.19
ELEV. DIFF. FROM MANOM. TO BAROM. (FT)	0.00	0.00	0.00
STACK GAS STATIC PRESSURE (IN. H2O GAGE)	0.01	0.01	0.01
STACK GAS STATIC PRESSURE (IN. HG ABS.)	30.02	30.02	30.02
AVERAGE SQUARE ROOT VELOCITY HEAD	0.307	0.304	0.314
PITOT TUBE COEFFICIENT	0.84	0.84	0.84
AVG STACK TEMP (F)	1742.8	1745.0	1730.4
STACK GAS VELOCITY STACK COND (FT/SEC)	35.81	35.22	36.26
CROSS SECTION STACK AREA (SQ FT)	8.0	8.0	0.8
STACK GAS FLOW RATE STD COND (DSCFM)	341. 9	353.3	373.8
STACK GAS FLOW RATE STACK COND (ACFM)	1719.0	1690.6	1740.6
NET TIME OF RUN (MIN)	60	60	60
NOZZLE DIAMETER (IN)	0.499	0.499	0.499
PERCENT ISOKINETIC	102.16	98.57	97.33
PARTICULATE COLLECTED (MG)	13.2	31.2	30.3
RESIDENCE TIME (SEC)	1.19	1.21	1.17
PARTICULATE EMISSIONS (GRAINS/SCF)	0.0057	0.0136	0.0126
PARTICULATE EMISSIONS (GRAINS/SCF) @ 7%02	0.0055	0.0090	0.0084
PARTICULATE (LBS/HR)	0.017	0.041	0.040
AVERAGE PARTICULATE EMISSIONS (GRAINS/SCF)		0.0106	0.0.5
AVERAGE PARTICULATE EMISSIONS (GRAINS/SCF) @ 7%0	12	0.0077	
NOTE: STANDARD CONDITIONS 68F, 29.92 in.		0.0077	
1401E. 3 MINDARD COMPITIONS 00F, 29.92 III.	. ny		

4.0 Description of Source

Crawford Industrial Group CB26H/CB200P is a multiple chambered, controlled air, hot hearth Batch Burn Cycle incinerator fired with propane. It has a 26 cubic foot primary chamber followed by a 34 cubic foot secondary chamber.

The flue gas is exhausted through the CB26H/CB200P stack. A schematic of the process and stack sampling location is included in Appendix 3 "Figures".

5.0 Sampling Procedures

EPA testing protocols utilized during this test program include the following;

EPA Method 1	Sample and Velocity Traverse for Stationary Sources			
EPA Method 2	Determination of Stack Gas Velocity and Volumetric Flow Rate			
EPA Method 3	Gas Analysis for CO2, O2, Excess Air and Dry Molecular Weight			
EPA Method 4	Determination of Moisture Content in Stack Gas			
EPA Method 5	Determination of Particulate Emissions from Stationary Sources			
EPA Method 9	Visual Determination of The Opacity of Emissions From Stationary			
	Sources			
EPA Method 10	Determination of Carbon Monoxide Emissions From Stationary			
	Sources			

The test runs were conducted in triplicate for all parameters with each being at least 60 minutes in duration.

6.0 Operating Conditions

Crawford Industrial Group personnel monitored operating conditions throughout the duration of the sampling program. The unit was operating under normal conditions at approximately 70 lb/hr.

7.0 Quality Assurance Procedures

Quality assurance procedures followed during these activities were applied consistent with the requirements outlined by the EPA methods referenced in 40 CFR Part 60. Analyzer calibrations, system bias and drift checks were completed before and after each sample run utilizing EPA Protocol 1 calibration gases.

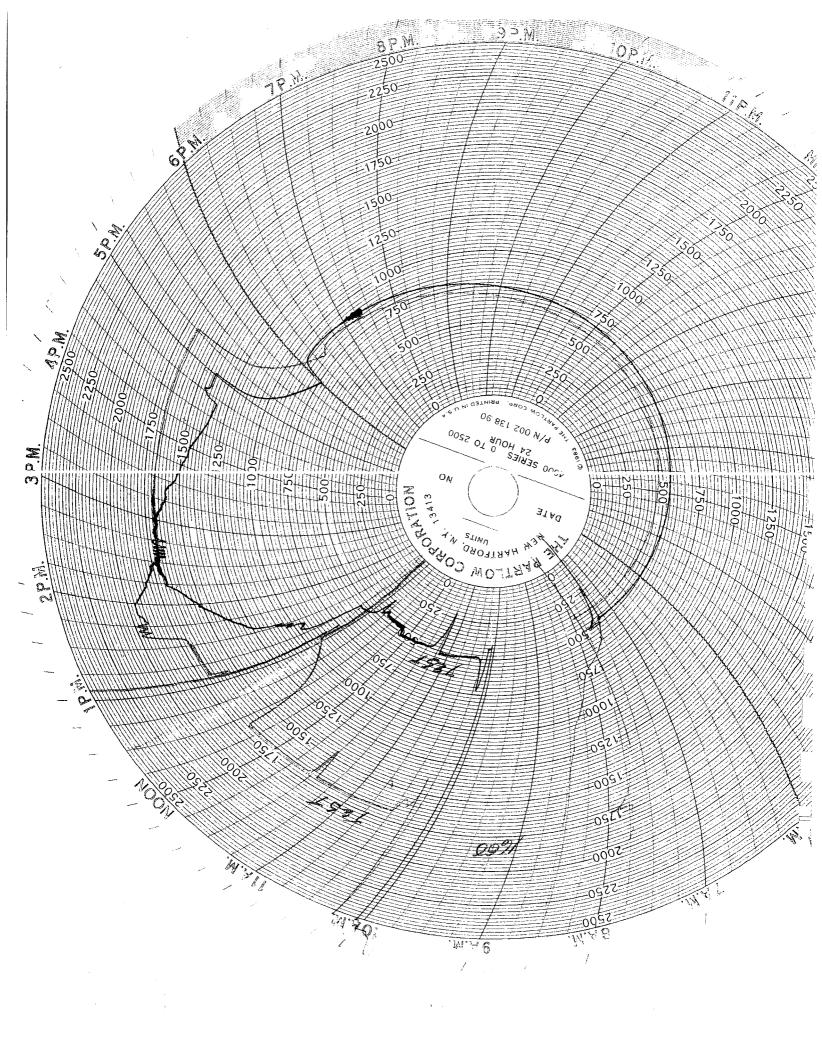
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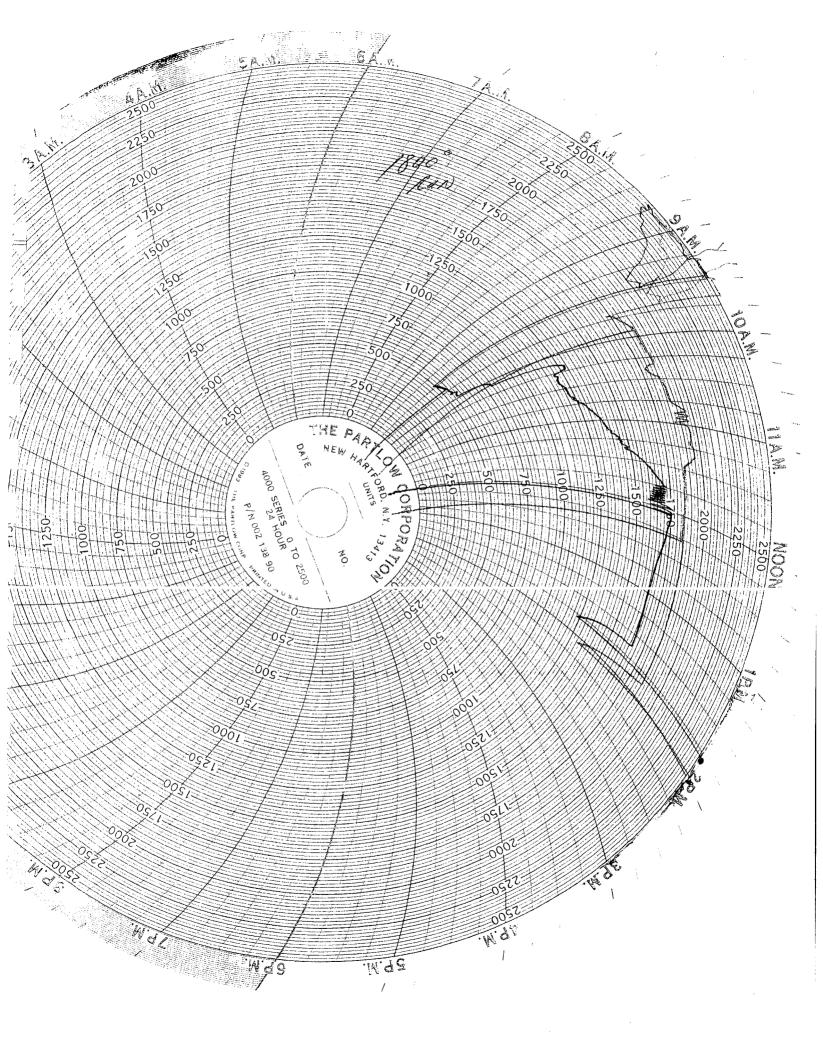
VISIBLE EMISS	ION OF	BSERVA	TION FORM 1
Method Used (Gircle One) Method 9 203A	2038	Other:	
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Facility Name	1005 1712	1 0-7007	
Street Address 9101 Parkers Otty	Landing		
Orlando		FL	32824
Process Animal Creame	tor	-13 200 H	rating Mode 1600 ° F
Control Equipment		Ope	rating Mode
Describe Emission Point Round 5/4	ch 12	_()	
Height of Emiss, Pt.		Height of Emiss	Pt. Rel. to Observer
Start ~ 20 End /	1 /	Start ~20 Direction to Emis	End '/ ss. Pt. (Decrees)
Start ~75' End	/)	Start 75°	End 1/
Vertical Angle to Obs. Pt. Start / 6 End Distance and Direction to Ob	1/	Direction to Obs	2 End 75°
Start ~ 1'above	- CHILLIAN I LOLI II	and '	
Describe Emissions Start C/C - / 100 Emission Color	ue	and / / Water Droplet P	
Start Clear End		Attached	
Describe Plume Background Start 6-cc 5 K Y Background Color		End //	
Start Cray End Wind Speed	11	Start Clouds Mind Direction	/ End //
Start 0 - 3 MPH End	<u></u>	Start Vo-v. Wet Builb Temp.	End RH Percent
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Observer's Name (Pilnt) Stephen C1 Webb	
Steplin Cr Will	Date 7-17-03
Coastel Hir Consultina	/Inc.
Certified By ETA	Date 2 - 13 - 03





RESIDENCE TIME CALCULATIONS

Company Name:

Crawford Industrial Group

Source:

CB26H/CB200P

Date:

7/17/2003

Charging Rate:

70 lb/hr

Chamber Temp:

1600°F

CU. FT. X 60 SEC

Residence Time Seconds

ACFM

Run 1:

CU. FT.

34

=

ACFM Residence Time

1847.1

1.10 Sec.

Run 2:

CU. FT.

34

ACFM Residence Time

1844.5 1.11 Sec.

Run 3:

CU. FT.

34

ACFM

1666.8

Residence Time

1.22 Sec.

Average:

1.14 Sec.

RESIDENCE TIME CALCULATIONS

Company Name:

Crawford Industrial Group

Source:

CB26H/CB200P

Date:

7/18/2003

Charging Rate:

70 lb/hr

Chamber Temp:

1800°F

CU. FT. X 60 SEC

Residence Time Seconds

ACFM

Run 1:

CU. FT.

34

=

ACFM

1719

Residence Time

1.19 Sec.

Run 2:

CU. FT.

34

ACFM Residence Time

1690.6 **1.21 Sec.**

Run 3:

CU. FT.

34

ACFM

1740.6

Residence Time

1.17 Sec.

Average:

1.19 Sec.

Appendix 2
Emission Calculations Spreadsheet
&
Results from Similar Source Stack Test

	Annual		Annual	
Description	Oper.	Units	Oper.	Units
			•	_
Expected	55	lbs/hour	2080	hours
PTE	70	lbs/hour	7000	hours

SO₂, NOx and TOC Emissions Estimates

Emissions based on Emission Factors (E.F.) from AP-42, Table 2.1-12. 7000 hours/yr represents the maximu potential hours of operation.

Expected PTE	E.F. SO ₂ 2.5 5	Units Ib/ton Ib/ton	Emissions SO ₂ 0.06875 0.175	Units Ib/hr Ib/hr	Emissions SO ₂ 0.0715 0.6125	Units tons/yr tons/yr
Expected PTE	E.F. NOx 3 6	Units Ib/ton Ib/ton	Emissions NOx 0.0825 0.21	Units Ib/hr Ib/hr	Emissions NOx 0.0858 0.735	Units tons/yr tons/yr
Expected PTE	E.F TOC 3 6	Units lb/ton lb/ton	Emissions TOC 0.0825 0.21	Units lb/hr lb/hr	Emissions TOC 0.0858 0.735	Units tons/yr tons/yr

PM & CO Emissions from Type IV Waste Combustion

Emissions based on identical source stack test (No. 127-001, 8/20/2003)

Expected PTE	E.F PM 0.031 0.05	Units lb/hr lb/hr	Emissions PM 0.031 0.05	Units Ib/hr Ib/hr	Emissions PM 0.03224 0.175	Units tons/yr tons/yr
Expected PTE	E.F CO 0.0476 0.1428	Units lb/hr lb/hr	Emissions CO 0.0476 0.1428	Units Ib/hr Ib/hr	Emissions CO 0.049504 0.4998	Units tons/yr tons/yr